

IN THE SUPREME COURT OF IOWA

PLANNED PARENTHOOD OF THE
HEARTLAND, INC. and DR. JILL,
MEADOWS, M.D.,

Petitioners/Appellants,
v.

TERRY BRANSTAD ex rel. IOWA
BOARD OF MEDICINE,

Respondents/Appellees.

S. Ct. No. 17-0708

**APPELLANTS' APPLICATION
FOR ADMISSION PRO HAC
VICE**

(Iowa Court Rule 31.14)

The undersigned seeks permission to appear pro hac vice in the above-captioned proceeding.

Applicant shall complete all of the following:

Did the applicant seek admission pro hac vice in the proceedings below?

Yes ☒ No ☐

If yes, attach copies of all related documents.

a. Applicant's full name, residential address, and business address.

Diana Salgado

Residential:

1519 North Kirkwood Rd.
Arlington, VA 22201

Business:

Planned Parenthood Federation of
America
1110 Vermont Ave, NW, Suite 300
Washington, DC 20005

- b. The name, address, and phone number of each client sought to be represented.

Planned Parenthood of the
Heartland, Inc.
PO Box 4557
Des Moines, IA 50305
515-280-9295

Dr. Jill Meadows, M.D.
PO Box 4557
Des Moines, IA 50305
515-280-9295

- c. The courts before which the applicant has been admitted to practice and the respective periods of admission.

Wisconsin State Courts, June 20, 2006, Bar No. 1056908
District of Columbia Courts, June 11, 2007, Bar No. 974855
US District Court for the District of Columbia, June 6, 2011
New York State Courts, 2012, Registration no. 5078100
4th Circuit Court of Appeals
10th Circuit Court of Appeals

- d. Has the applicant ever been denied admission pro hac vice in this state?
Yes ☐ No ☒

If yes, on a separate page specify the caption of the proceedings, the date of the denial, and what findings were made. Attach copies of all related documents.

- e. Has the applicant ever had admission pro hac vice revoked in this state?
Yes ☐ No ☒

If yes, on a separate page specify the caption of the proceedings, the date of the revocation, and what findings were made. Attach copies of all related documents.

- f. Has the applicant ever been denied admission in any jurisdiction for reasons other than failure of a bar examination?
Yes ☐ No ☒

If yes, on a separate page specify the jurisdiction, caption of the proceedings, the terms of the probation, and what findings were made. Attach copies of all related documents.

k. Has the applicant ever been held formally in contempt or otherwise sanctioned by any court in a written order in the last five years for disobedience to its rules or orders?

Yes ☐ No ☒

If yes, on a separate page specify the nature of the allegations, the name of the court before which such proceedings were conducted, the date of the contempt order or sanction, the caption of the proceedings, and the substance of the court's rulings. Attach to this application a copy of the written order or a transcript of the oral rulings and other related documents.

l. Has the applicant filed an application to appear pro hac vice in this state within the preceding two years?

Yes ☒ No ☐

If yes, on a separate page list the name and address of each court or agency and a full identification of each proceeding in which an application was filed, including the date and outcome of the application. Attach copies of all related documents.

m. I acknowledge my familiarity with the rules of professional conduct, the disciplinary procedures of this state, the standards for professional conduct, the applicable local rules, and the procedures of the court before which I seek to practice.

Yes ☒ No ☐

n. List the name, address, telephone number, and personal identification number of an in-state lawyer in good standing of the bar of this state who will sponsor the applicant's pro hac vice request.

Rita Bettis
AT0011558
(515)-243-3988 ext. 115
505 Fifth Avenue, Ste. 901
Des Moines, IA 50309-2316

If yes, on a separate page specify the jurisdiction, caption of the proceedings, the date of the denial, and what findings were made. Attach copies of all related documents.

g. Has the applicant ever been formally disciplined or sanctioned by any court in this state?

Yes ☐ No ☒

If yes, on a separate page specify the nature of the allegations, the name of the authority bringing such proceedings, the caption of the proceedings, the date filed, what findings were made, and what action was taken in connection with those proceedings. Attach copies of all related documents.

h. Has the applicant ever been the subject of any injunction, cease-and-desist letter, or other action arising from a finding that the applicant engaged in the unauthorized practice of law in this state or elsewhere?

Yes ☐ No ☒

If yes, on a separate page, specify the nature of the allegations, the name of the authority bringing such proceedings, the caption of the proceedings, the date filed, what findings were made, and what action was taken in connection with those proceedings. Attach copies of all related documents.

i. Has any formal, written disciplinary proceeding ever been brought against the applicant by a disciplinary authority or unauthorized practice of law commission in any other jurisdiction within the last five years?

Yes ☐ No ☒

If yes, on a separate page specify as to each such proceeding: the nature of the allegations, the name of the person or authority bringing such proceedings, the date the proceedings were initiated and finally concluded, the style of the proceedings, and the findings made and actions taken in connection with those proceedings. Attach copies of all related documents.

j. Has the applicant ever been placed on probation by a disciplinary authority in any other jurisdiction?

Yes ☐ No ☒

CERTIFICATE OF SERVICE

The undersigned certifies a copy of this application was served on the following parties (list names and addresses below) on the 9th day of May 2017 by using the EDMS system and that service will be accomplished by the EDMS system.

THOMAS J. MILLER
Attorney General Of Iowa
JEFFREY S. THOMPSON
Solicitor General of Iowa
THOMAS J. OGDEN
Assistant Attorney General

Iowa Department of Justice
Hoover State Office Bldg., 2nd Fl.
1305 East Walnut Street
Des Moines, Iowa 50319
Phone: (515) 281-5976
Fax: (515) 281-4902
Email: Jeffrey.Thompson@iowa.gov
Email: Thomas.Ogden@iowa.gov

/s/Rita Bettis

Rita Bettis, AT0011558
ACLU of Iowa
505 Fifth Avenue, Ste. 901
Des Moines, IA 50309-2316
Telephone: (515)-243-3988
Facsimile: (515) 243-0654
E-mail: rita.bettis@aclu-ia.org

ATTORNEY FOR PETITIONERS-
APPELLANTS

o. I acknowledge that service upon the in-state lawyer in all matters connected with the proceedings will have the same effect as if personally made upon me.

Yes ☒ No ☐

p. If the applicant has appeared pro hac vice in this state in five proceedings within the preceding two years, the applicant shall, on a separate page, provide a statement showing good cause why the applicant should be admitted in the present proceeding.

q. On a separate page the applicant shall provide any other information the applicant deems necessary to support the application for admission pro hac vice.

I certify under penalty of perjury and pursuant to the laws of the state of Iowa that the preceding is true and correct.

5/8/17

Date


Diana Salgado

Rule 31.25—Form 1: Application for Admission Pro Hac Vice--District Court

Iowa District Court for <u>Polk</u> County <i>County where your case is filed</i>	
Planned Parenthood of the Heartland <hr/> Dr. Jill Meadows <hr/> Plaintiff(s) <i>Full name: first, middle, last</i> vs. State of Iowa <hr/> Iowa Board of Medicine <hr/> Defendant(s) <i>Full name: first, middle, last</i>	Case no. _____ <div style="text-align: center;"> Application for Admission Pro Hac Vice--District Court Iowa Court Rule 31.14 </div>

1. Application

The undersigned seeks permission to appear pro hac vice in the above-captioned proceeding.

Applicant must complete all of the following:

If this matter involves review of an agency action, did the applicant seek admission pro hac vice in the proceedings below? ☐ Yes ☐ No

If yes, attach copies of all related documents.

- a. Applicant's full name, residential address, email address, and business address.

Diana Salgado	diana.salgado@ppfa.org		
<i>Full name: first, middle, last</i>	<i>Email address</i>		
1110 Vermont Ave. NW Suite 300	Washington	DC	20005
<i>Mailing address</i>	<i>City</i>	<i>State</i>	<i>ZIP code</i>
<i>Business address</i>	<i>City</i>	<i>State</i>	<i>ZIP code</i>

- b. The name, address, and telephone number of each client to be represented.

Planned Parenthood of the Heartland, Inc., PO Box 4457, Des Moines, IA 50305 /
 Dr. Jill Meadows, MD, PO Box 4557, Des Moines, IA 50305 / (512) 280-7000

- c. The courts before which the applicant has been admitted to practice and the respective periods of admission and any jurisdiction in which the out-of-state lawyer has been licensed to practice as a foreign legal consultant and the respective period of licensure.

See attached.

- d. Has the applicant ever been denied admission pro hac vice in this state?

☐ Yes ☒ No

Rule 31.25—Form 1: *Application for Admission Pro Hac Vice--District Court, continued*

If yes, on a separate page specify the caption of the proceedings, the date of the denial, and what findings were made. Attach copies of all related documents.

- e. Has the applicant ever had admission pro hac vice revoked in this state?

☐ Yes ☒ No

If yes, on a separate page specify the caption of the proceedings, the date of the denial, and what findings were made. Attach copies of all related documents.

- f. Has the applicant ever been denied admission in any jurisdiction for reasons other than failure of a bar examination? ☐ Yes ☒ No

If yes, on a separate page specify the caption of the proceedings, the date of the denial, and what findings were made. Attach copies of all related documents.

- g. Has the applicant ever been formally disciplined or sanctioned by any court in this state? ☐ Yes ☒ No

If yes, on a separate page specify the nature of the allegations, the name of the authority bringing such proceedings, the caption of the proceedings, the date filed, what findings were made, and what action was taken in connection with those proceedings. Attach copies of all related documents.

- h. Has the applicant ever been the subject of any injunction, cease-and-desist letter, or other action arising from a finding that the applicant engaged in the unauthorized practice of law in this state or elsewhere? ☐ Yes ☒ No

If yes, on a separate page specify the nature of the allegations, the name of the authority bringing such proceedings, the caption of the proceedings, the date filed, what findings were made, and what action was taken in connection with those proceedings. Attach copies of all related documents.

- i. Has any formal, written disciplinary proceeding ever been brought against the applicant by a disciplinary authority or unauthorized practice of law commission in any other jurisdiction within the last five years? ☐ Yes ☒ No

If yes, on a separate page specify as to each such proceeding: the nature of the allegations, the name of the person or authority bringing such proceedings, the date the proceedings were initiated and finally concluded, the style of the proceedings, and the findings made and actions taken in connection with those proceedings. Attach copies of all related documents.

- j. Has the applicant ever been placed on probation by a disciplinary authority in any other jurisdiction? ☐ Yes ☒ No

If yes, on a separate page specify the jurisdiction, caption of the proceedings, the terms of the probation, and what findings were made. Attach copies of all related documents.

- k. Has the applicant ever been held formally in contempt or otherwise sanctioned by any court in a written order in the last five years for disobedience to the court's rules or orders? ☐ Yes ☒ No

If yes, on a separate page specify the nature of the allegations, the name of the court before which such proceedings were conducted, the date of the contempt order or sanction, the caption of the proceedings, and the substance of the court's rulings. Attach to this application a copy of the written order or a transcript of the oral ruling and other related documents.

- l. Has the applicant filed an application to appear pro hac vice in this state within the preceding two years? ☐ Yes ☒ No

Rule 31.25—Form 1: *Application for Admission Pro Hac Vice--District Court*, continued

If yes, on a separate page list the name and address of each court or agency and a full identification of each proceeding in which an application was filed, including the date and outcome of the application. Attach copies of all related documents.

- m. The applicant acknowledges familiarity with the rules of professional conduct, the disciplinary procedures of this state, the standards for professional conduct, the applicable local rules, and the procedures of the court before which the applicant seeks to practice. ☒ Yes ☐ No
- n. List the name, address, telephone number, email address, and personal identification number of an in-state lawyer in good standing of the bar of this state who will sponsor the applicant's pro hac vice request.

<u>Rita Bettis</u>	<u>AT0011558</u>	<u>rita.bettis@aclu-ia.org</u>	
<i>Lawyer's name</i>	<i>PIN</i>	<i>Email address</i>	
<u>505 Fifth Avenue, Ste. 901</u>	<u>Des Moines</u>	<u>IA</u>	<u>50309-2316</u>
<i>Lawyer's address</i>	<i>City</i>	<i>State</i>	<i>ZIP code</i>

- o. The applicant acknowledges that service upon the in-state attorney in all matters connected with the proceedings will have the same effect as if personally made upon the applicant. ☒ Yes ☐ No
- p. If the applicant has appeared pro hac vice in this state in five proceedings within the preceding two years, the applicant must, on a separate attached page, provide a statement showing good cause why the applicant should be admitted in the present proceeding.
- q. On a separate attached page the applicant must provide any other information the applicant deems necessary to support the application for admission pro hac vice.
- r. Has the applicant registered with the office of professional regulation and paid the fee as required by Iowa Court Rule 31.14(11) within five years of the date of this application? ☒ Yes ☐ No

Lawyer's Oath and Signature and Certificate of Service on next page

Rule 31.25—Form 1: Application for Admission Pro Hac Vice--District Court, continued

2. Oath and Signature

I, Diana Salgado, have read this Application, and I certify under
Print your name

penalty of perjury and pursuant to the laws of the State of Iowa that the preceding is true and correct.

Signed on: May 2, 2017 Diana Salgado
*Month Day Year Your signature**

1110 Vermont Ave. NW, Suite 300 Washington DC 20002
Mailing address City State ZIP code

(202) 9734800 diana.salgado@ppfa.org christen.hammock@ppfa.org
Telephone number Email address Additional email address, if applicable

** If filing in paper, you must handwrite your signature on this form. If filing electronically, you may handwrite your signature on the form, scan the form, and then file it electronically, or, you may affix a digitized signature and file the form electronically.*

Certificate of Service

The undersigned certifies a copy of this application was served on the following parties:

on the 3rd day of May, 2017
Month Year

by ☐ Personal delivery ☒ Deposit in the U.S. mail ☒ Electronic service via e-mail and EDms

Rita Betts
Signature of server

List of Court Admissions for Diana O. Salgado

Wisconsin State Courts, June 20, 2006, Bar No. 1056908
District of Columbia Courts, June 11, 2007, Bar No. 974855
US District Court for the District of Columbia, June 6, 2011
New York State Courts, 2012, Registration no. 5078100
4th Circuit Court of Appeals
10th Circuit Court of Appeals

CLERK OF DISTRICT COURT

POLK COUNTY COURTHOUSE
500 MULBERRY
DES MOINES IA 50309
(515) 286-3772

Notice to Attorney Admitted Pro Hac Vice

As indicated in the attached notice, this case is in electronic format. As an attorney admitted pro hac vice on the case, you need to follow some special steps to register for e-filing.

When you register, select the Pro Hac Vice option under User Role. On the page where you enter your User Account information, enter the information according to the instructions, with the special exception that you enter the PHV PIN we have assigned to you in the ICIS ID field. Complete your account registration.

Chapter 16 Rules and eFiling training documents are available at:

http://www.iowacourts.gov/eFiling/Training_Documents/

Failure to register means you will not receive electronic service on this case.

Your uniquely assigned pro hac vice pin is: PHV001609

Name: DIANA SALGADO

Case: 05771 EQCE081503

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

Case No.: 05771 EQCE081503

Notice of Electronic Filing Requirement

YOU ARE HEREBY NOTIFIED THAT YOU ARE ATTEMPTING TO FILE IN A COUNTY THAT UTILIZES ELECTRONIC FILING. YOUR PAPER FILINGS ARE BEING RETURNED TO YOU AND HAVE NOT BEEN ACCEPTED AT THIS OFFICE.

You are required to register through the Iowa Judicial Branch website at <https://www.iowacourts.state.ia.us/EFile/> and obtain a log in and password for the purposes of filing and viewing documents on your case and of receiving notification of filings, court rulings and events. REFER TO THE IOWA COURT RULES CHAPTER 16 PERTAINING TO THE USE OF THE ELECTRONIC DOCUMENT MANAGEMENT SYSTEM (EDMS). For court rules on the protection of personal information in court filings, refer to Division VI of Iowa Court Rules Chapter 16.

ELECTRONIC FILING IS MANDATORY:

Electronic filing of new court cases and filings in cases that have been converted to electronic is mandatory in counties where the EDMS has been implemented, unless otherwise required or authorized by the Chapter 16: Rules Pertaining to the Use of the Electronic Document Management System.

YOU MUST REGISTER TO USE EDMS:

Registration is required before you can use the EDMS. You are required to have a current e-mail account for use with EDMS. When you have completed your registration and received your login (username) and password, you can begin filing and receiving documents immediately. Your registration constitutes your request for, and consent to, electronic service of court-generated documents and documents filed electronically by other parties.

EXCEPTIONS:

For good cause, the court, or clerk if no judge is available, may authorize a filer to submit a document in paper. Upon showing of exceptional circumstances, the chief judge of the district in which a case is pending may grant you an exemption from registering and filing electronically.

READ CHAPTER 16: RULES PERTAINING TO THE USE OF THE ELECTRONIC DOCUMENT MANAGEMENT SYSTEM (EDMS), available on the Iowa Judicial Branch Filer's Interface at <https://www.iowacourts.state.ia.us/EFile/>, before you register for or use the Electronic Document Management System.